

FILED 17 SEP '20 13:57 USDC-ORE

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION**

UNITED STATES OF AMERICA

1:20-cr- 425-MC

v.

INDICTMENT

ROBERT FRANCIS KLEIN,

18 U.S.C. §§ 2261A(2)(A), (2)(B)

18 U.S.C. § 875(c)

Defendant.

THE GRAND JURY CHARGES:

COUNT 1

Stalking

18 U.S.C. § 2261A(2)(A)

From on or about June 27, 2019, through on or about September 10, 2020, in the District of Oregon, defendant, **ROBERT FRANCIS KLEIN**, with the intent to harass and intimidate, used an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, fear of death or serious bodily injury to AV1 and AV2.

In violation of Title 18, United States Code, Section 2261A.

COUNT 2

**Stalking
18 U.S.C. § 2261A(2)(B)**

From on or about June 27, 2019, through on or about September 10, 2020, in the District of Oregon, defendant, **ROBERT FRANCIS KLEIN**, with the intent to harass and intimidate, used an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to AV1 and AV2.

In violation of Title 18, United States Code, Section 2261A(2)(B).

COUNT 3

**Threats via Interstate Communications
18 U.S.C. § 875(c)**

On or about September 1, 2020, in the District of Oregon, defendant, **ROBERT FRANCIS KLEIN**, did knowingly and willfully transmit in interstate commerce, a communication containing a threat to injure the person of another, to wit: a telephonic voice message threatening to decapitate AV2;

In violation of Title 18, United States Code, Section 875(c).

COUNT 4

**Threats via Interstate Communications
18 U.S.C. § 875(c)**

On or about September 4, 2020, in the District of Oregon, defendant, **ROBERT FRANCIS KLEIN**, did knowingly and willfully transmit in interstate commerce, a

communication containing a threat to injure the person of another, to wit: a telephonic voice message threatening to break the spine of AV2;

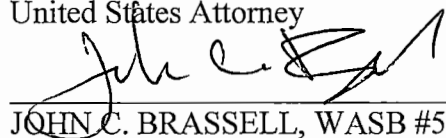
In violation of Title 18, United States Code, Section 875(c).

Dated this 17 day of September 2020.

A TRUE BILL.

Presented by:

BILLY J. WILLIAMS
United States Attorney



JOHN C. BRASSELL, WASB #51639
Assistant United States Attorney